

**SF Investments, Inc. (“SFI”)
New Vernon Wealth Management, LLC (“NV-WM”)
Privacy Act Disclosure**

SFI and NV-WM Notice of Client Privacy Policy

Our Commitment to Your Privacy: SFI and NV-WM have a policy of protecting the confidentiality and security of information we collect about our clients. We do not share nonpublic information about you (“**Information**”) outside of our affiliates without your consent except for the specific purposes described below, in accordance with all applicable laws. This notice of SFI’s and NV-WM’s privacy policy (“**Privacy Policy**”) describes the Information we may gather and the circumstances under which we may share it.

Why We Collect and How We Use Information: We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes advising you about our products, services, and other opportunities, maintaining your accounts with us, processing transactions requested by you, or other persons authorized by you and administering our business.

How We Gather Information: We get most Information directly from you, when you apply for, access and use our and our business associates' financial products and services — whether in person, by telephone, written communications and applications, or electronically. We may verify this information or get additional information from consumer reporting agencies or public sources. This Information may relate to your finances, employment, avocations, or other personal characteristics, as well as transactions and interactions with or through us or with others.

How We Protect Information: Our employees, registered representatives and investment adviser representatives acting on our behalf are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as to administer or offer our products or services. We also maintain physical, electronic, and procedural safeguards to protect Information, which comply with all applicable laws. Employees who violate our Privacy Policy will be subject to disciplinary process.

Disclosure of Information: We may disclose any Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies to help us, among other things, prevent fraud. In addition, we may disclose Information to our affiliates, other companies, or third-party service providers (i) to enable them to provide business services for us, such as performing computer related or data maintenance or processing services for us, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering our products and services to you, or (iv) for credit review or reporting purposes. In addition, we may also provide Information to our affiliates or non-affiliated companies with which we have joint marketing agreements (such as an agreement with another registered investment adviser) to assist us in offering their products and services to you; however, you are entitled to opt out of the sharing of your Information for this purpose by contacting us and so instructing us. Except in the previously enumerated situations, without your consent, we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company or telemarketer. Moreover, it is our policy to require all third parties that are to receive any Information to sign strict confidentiality agreements.

Our Former Clients: Even if you are no longer a client or investor, our Privacy Policy will continue to apply to you.

To Whom This Policy Applies: This Privacy Policy applies to SFI and NV-WM, along with all accounts opened or administered by SFI and all accounts managed or administered by NV-WM.

Access to and Correction of Information: Upon your written request, we will make available for your review any file we may maintain for your personal Information; provided, however, that any Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If you notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in any future disclosure of the disputed Information.

Further Information: We reserve the right to change this Privacy Policy at any time. The examples contained within this Privacy Policy are illustrations and are not intended to be exclusive. This notice is designed to comply with a federal law and SEC and Federal Trade Commission regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

For more information, please contact Gary Just at (847) 926-5724.